

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. HAGEL
CLERK OF COURT

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

HUSSEIN GULED ADAM,
a/k/a Abdifatah Farah Hersi,

Defendant.

CASE NO. 19 cr 162

JUDGE Judge Morrison

INDICTMENT

18 U.S.C. § 1425(b)
18 U.S.C. § 1015(c)

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1
(Unlawful Procurement of Naturalization)

From at least on or about March 23, 2005 and continuing through on or about June 30, 2008, in the Southern District of Ohio, the defendant, HUSSEIN GULED ADAM a/k/a/ Abdifatah Farah Hersi, did knowingly apply for, procure and obtain naturalization by the United States government for himself, to which he was not entitled, by making false and fraudulent statements on his Form N-400, Application for Naturalization, including but not limited to false and fraudulent statements about his identity and his prior truthfulness in obtaining immigration benefits or entry into the United States, and was ultimately naturalized as a United States citizen.

In violation of 18 U.S.C. § 1425(b).

COUNT 2
(Improper Use of a Naturalization Certificate)

On or about October 15, 2014, in the Southern District of Ohio, the defendant, HUSSEIN GULED ADAM a/k/a/ Abdifatah Farah Hersi, used and attempted to use a certificate of naturalization and of citizenship, and any duplicate and copy thereof, knowing the same to have

been procured by fraud and false evidence, to wit: a United States Certificate of Naturalization, issued in the defendant's name, which he presented, or a duplicate copy thereof, as part of I-130 Petitions for Alien Relatives for his two biological sons, knowing that such naturalization certificate had been procured by fraud and false evidence and otherwise unlawfully obtained.

In violation of 18 U.S.C. § 1015(c).

A TRUE BILL

s/Foreperson

FOREPERSON

**BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY**


JESSICA W. KNIGHT, (0086615)

Assistant United States Attorney